

12. We agree with your proposal to extend the prohibition against any disruption of local or long distance telephone service for non-payment of charges to include (not collect calls) Reverse Charge Information Services.

13. In response to your request for comment on Protection Against Non-Payment of Legitimate Charges, (E., number 40 pp. 16) we request that due to the "double positive acceptance" and required double disclosure nature of RCIS, the FCC consider more stringent rules against the consumers ability to deny all knowledge of placing the call or that he didn't know there was a charge. In the case of a disputed charge the IP should have the right to privately bill the consumer and pursue additional collection activity if necessary.

14. We also advocate and agree (in response to your request for comments, number 37, pp.15) that (instead of collect calls), you require that Ravenna charge information service calls be included

CONCLUSION

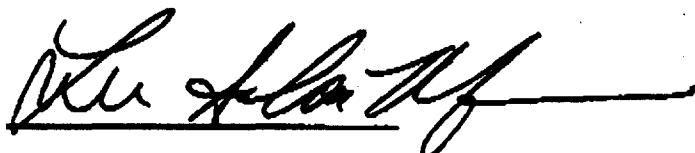
Reverse Charge Information Services is a new method of provisioning Pay-Per-Call services that offers benefits above and beyond those provided by 900.

Versions of this billing method are already in practice but due to lack of regulation they are sure to face the same problems 900 did in it's infancy stages.

The FCC is considering rules that will allow these types of services yet to achieve it's true benefits these rules must be clear and complete. As we requested in our FTC comments, the FTC should also create rules for this method related to Advertising, Standards of Service, and Billing & Collection in order to curtail circumvention of conventional 900 number laws due to lack of regulation for the new method.

Reverse Charge Information Services were originally conceived in the most unusual of ways. Yet they provide a superior means to offer pay-per-call services that addresses the needs of consumers, service bureaus, billing companies, phone companies, regulators, and IP's alike. Although it may take some extra work and thought, we feel it's imperative that the FCC address comprehensive rules for this method in order for it to reach its potential to provide greater safeguards for all Pay-Per-Call industry participants. Safeguards that have never before been afforded so effectively. We thank you for your time and consideration.

Respectfully Signed



Lee Alan Marc
Executive Vice President
SUMMIT TELECOMMUNICATIONS CORPORATION

Date : 4-16-93



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SUMMIT TELECOMMUNICATIONS CORPORATION

SUMMIT TELECOMMUNICATIONS CORPORATION is one of a group of sister companies involved in various aspects of telecommunications. Sister company businesses include the provision of International Long Distance Services as well as the processing of collect calls from payphones throughout the United States for over 6 years. The management team and their credentials are listed below.

ANTHONY FISCHLER PRESIDENT

Mr. Fischler is an eight year veteran and pioneer in the United States deregulated pay telephone business. He is one of the co-founders of the California Payphone Association (CPA) and was elected both Director and Chairman of the Membership Committee for that organization. He was instrumental in making the CPA one of the largest and most influential associations of its kind in the U.S. Mr. Fischler brings an extensive and varied background to **SUMMIT TELECOMMUNICATIONS CORPORATION**. This includes the founding and marketing of one of the first pay telephone companies in the country as well as founding, managing and operating his own payphone billing and collection company. His prior background includes international product marketing, public relations, multi-media marketing production, and the production of cable television programs and record albums.

LEE A. MARC EXECUTIVE VICE PRESIDENT

Mr. Marc is an 8 year veteran of the interactive telecommunications technology industry. His positions over the last 8 years include Vice President of Marketing for Interactive TeleMedia, a \$70 million dollar per annum sales promotion and direct response marketing company, Director of New Product Development for Lo/Ad Communications and General Manager of Phoneworks Los Angeles. These companies specialize in the design and implementation of promotional marketing campaigns utilizing 800 and 900 numbers combined with interactive telecommunications technology. He is one of the founders and presently a public affairs committee member of the National Association for Information Services (NAIS) and is frequently called upon to speak at industry conventions. Mr. Marc has published numerous articles on the design and development of interactive telecommunications applications and marketing, the technology upon which **SUMMIT TELECOMMUNICATIONS CORPORATION** is founded.

**STEPHEN EDWARDS
EXECUTIVE VICE PRESIDENT**

Mr. Edwards is a regulatory attorney with fifteen years experience in dealing with regulated industries such as telecommunications. He has appeared extensively before the Federal Communications Commission (FCC), the Public Utilities Commission (PUC) and several other federal agencies. He was an elected Board Member of the California Payphone Association (CPA) and acted as its past President. He also founded and acted as past president of the American Public Communication Council, a national organization representing the pay telephone industry. In addition, Mr. Edwards has held executive positions in the telecommunications industry over the past 6 years and has had extensive managerial experience within fortune 100 companies.

**FARZAD MOBIN
VICE PRESIDENT-TECHNOLOGY**

Mr. Mobin completed his education in the Artificial Intelligence Lab at the Massachusetts Institute of Technology (MIT), where he majored in Computer Science and graduated with honors. He has worked within the telecommunications industry for the past 6 years. His expertise in computer hardware and software design has enabled him to create ground breaking innovations in telecommunications technology design. His work has enhanced the productivity and profitability of all ventures he has been associated with. Mr. Mobin is responsible for the creation of the hardware, software and network design upon which SUMMIT TELECOMMUNICATIONS is founded.

MANAGEMENT INFORMATION REPORTS

The Daily Performance Report is provided to IP's who are processing their calls on SUMMIT'S Voice Response Equipment. This Equipment utilizes:

1. Real-time ANI
2. Voice recognition
3. ISDN technology
4. X.25 external database connections
5. Real-time database management and creation
6. Network access and real-time posting to customer service operator terminals.
7. Daily-weekly-monthly call limiting controls

Daily Performance Reports can be customized to meet a specific IP's needs and any data that can be derived from a call can be reported. An example of this report is attached. It is broken into four sections.

The first section outlines the program identification information and lists 800 number, IP name service bureau name, price per minute, and program name. The second section lists information for calls submitted for billing including: call date, billable number of calls, billable minutes and total value.

The next two sections outline exactly what happened that day for all calls; from the moment an 800 number call came in to the moment the consumer accepted the charges after having been called back and everything in between.

The 800 Call Analysis section tells you how many 800 calls you received, how many minutes those calls represented. How many calls were rejected as bad risk callers, how many callers requested a callback, and of the call-back requests, how many were touch tone and how many were voice recognition.

Additionally each call is labeled with a "Validation Status" and the report gives you a count for each kind of validation. The Validation Status tells you information such as: for what reason a caller to the 800 number was rejected and denied access to your program. (See attached descriptions for validation status)

The Call Back Analysis includes: How many call back attempts our computer made, how many were completed, and of the completed calls how many accepted the charges, and of those, how many were touch tone and how many were voice recognition. There is also a Status count for this section as well as a count of remote validation attempts to the Line Information Database and their results.

DAILY PERFORMANCE REPORT

EXHIBIT B Page 2

Owner: ABC Company
IP: XYZ Info Services
Application: Direct Mail Sweepstakes
Inbound: 800-627-7727
Origination ANI: 702-382-1197
1st Minute Rate: 3.98
Add Minute Rate: 3.98
Processing Service Bureau: Summit Telecommunications Corp
DNIS (Routing Number): 7729
Rundate: 12/21/92

CALLS SUBMITTED FOR BILLING

Call Date	Billable Calls	Billable Minutes	Total Value
12/20/92	190	365	\$ 1452.70

800 CALL ANALYSIS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**DESCRIPTIONS OF INBOUND VALIDATION STATUS CODES
ON DAILY PERFORMANCE REPORT**

800 CALL ANALYSIS:

GCL1 Good Caller ANI-1

Passed the remote validation to Line Information Database in the past and is in internal Good Caller Database (this means remote validation is not necessary). All records from the Good Caller Database that are 10 or more days old are deleted.

INV Invalid

When 800 carrier doesn't send us a good ANI and the caller after 3 tries does not (using touch tone or voice recognition) transmit a good ANI (rare).

GCL1 Bad Caller ANI-1*

Caller did not pass remote validation check in the past and was posted to the Bad Caller ANI database. Caller was rejected on the inbound 800 number call.

NBA Non-Billable Area*

Caller was in the "Unbillable area" internal database, and was rejected on the inbound 800 call.

RVM-1 Remote Validation-1

Caller passed all internal database tests but is not in Good Caller Database. Requires Remote Validation from Line Information Database.

PRL1 Pre-Refuse-1*

Caller refused a call back too many times in the past (up to our limit) and was rejected on the inbound 800 call.

PRL2 Pre-Refuse-2

Caller refused a call back during this 800 call.

PRL3 Pre-Refuse-3*

EXHIBIT B - PAGE 3

DESCRIPTIONS OF CALL-BACK VALIDATION STATUS CODES
ON DAILY PERFORMANCE REPORT

CALL BACK ANALYSIS:

RCA2 Bad Caller ANI-2*

Caller required remote validation from Line Information Database after the inbound 800 call, and came back as having a bad caller ANI. As a result caller was never called back and will be posted to the internal Bad Caller ANI database for rejection the next time they call the 800 number.

GCA2 Good Caller Ani-2

Caller required remote validation from Line Information Database on the 800 call and came back as a good caller ANI. As a result the caller was called back and will be posted to the internal Good Caller Database for acceptance the next time they call the 800 number - remote validation will not be necessary. All records from the Good Caller Database that are 10 or more days old are deleted.

RKM2 Remote Validation-2

Caller requires remote validation from the Line Information Database as a result of 800 call database checks, and the Line Information Database Service was temporarily out of order. As a result the caller was called back.

ROR2 Post Refuse-2*

Caller didn't accept the charges when called back after the 800 call back request. As a result the caller was posted to the ROR1 database for checking the next time he calls the 800 number. After too many refusals of charges by the caller, he/she will be rejected on the next 800 call.

NOA2 No Answer-1*

Caller didn't answer the phone or his line was busy when we called him back after the 800 call back request. As a result the caller was posted to the NOA1 database for checking the next time he calls the 800 number. After too many occurrences of not answering the phone after a call back request, he/she will be rejected on his/her next 800 call.